

**STATE OF ILLINOIS
 ILLINOIS COMMERCE COMMISSION**

**Illinois Commerce Commission
 On its Own Motion**

**Investigation concerning Illinois Bell Telephone
 Company's compliance with Section 271
 of the Telecommunications Act of 1996**

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)
)
) **Docket No. 01-0662**
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CHIEF CLERK'S OFFICE

PETITION TO INTERVENE

Z-Tel Communications, Inc. ("Z-Tel"), by its attorneys, hereby petitions the Illinois Commerce Commission ("Commission") for leave to intervene in the above captioned proceeding, pursuant to Section 200.200 of the Commission's Rules of Practice. In support of this petition, Z-Tel states as follows:

1. Z-Tel has a substantial interest in the issues raised in this proceeding. As a certified competitive telecommunications carrier that provides residential telecommunications and enhanced services in the state of Illinois, Z-Tel relies on unbundled network elements and operations support systems provided by Illinois Bell Telephone Company d/b/a Ameritech Illinois ("Ameritech") to competitive carriers.

2. Z-Tel respectfully requests that it be granted leave to intervene and participate fully as a party of record in the above-referenced proceeding, including the right to file briefs, present testimony and exhibits, and cross-examine witnesses.

3. No party to this proceeding will be prejudiced by Z-Tel's intervention, nor will Z-Tel's intervention disrupt the proceeding. Z-Tel's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

4. Z-Tel's interest in this proceeding cannot be adequately represented by any other party to this docket.

5. Should this petition be granted, Z-Tel requests that the Commission and all parties please include the following on the service list:

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WHEREFORE, Z-Tel respectfully requests that the Commission grant it leave to intervene, and permission to fully participate in this proceeding.

Respectfully submitted,



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COUNSEL FOR Z-TEL COMMUNICATIONS, INC.

Dated: November 14, 2001

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On its Own Motion)	
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Investigation concerning Illinois Bell Telephone)	Docket No. 01-0662
Company's compliance with Section 271)	
of the Telecommunications Act of 1996)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Z-Tel Communications, Inc.'s Motion to Intervene in the above-captioned proceeding filed November 14, 2001, was mailed first-class, postage prepaid to the following:

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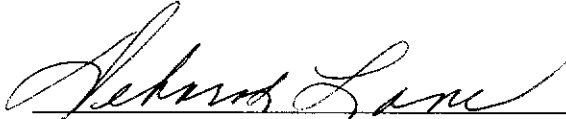
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DATED this 14th day of November, 2001.

KELLEY DRYE & WARREN LLP


Deborah Lane, Secretary

VERIFICATION

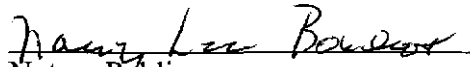
STATE OF VIRGINIA)
)
COUNTY OF FAIRFAX)

I, Tamara E. Connor, being duly sworn, state that I am the attorney representing Z-Tel Communications, Inc., that I have read the foregoing Petition to Intervene, and that the statements contained therein are true and correct to the best of my knowledge and belief.



Tamara E. Connor

Subscribed and sworn to before me this 14th day of November, 2001.


Notary Public

My Commission Expires:

March 31, 2005